

Exhibit K

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Attorneys for Plaintiffs
CHARISSA W. and NICOLE D.

SUPERIOR COURT OF CALIFORNIA

COUNTY OF NAPA

CHARISSA W. and NICOLE D.,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC., et al.

Defendants.

CASE NO: 26-22191

Judicial Council Coordination
Proceeding No. 4374

**FIRST AMENDED NOTICE OF
TAKING DEPOSITION DUCES
TECUM**

TO ALL PARTIES HEREIN, AND TO THEIR ATTORNEYS OF RECORD:

DATE: October 25, 2005

TIME: 9:00 a.m.

PLACE: New York Marriott at the Brooklyn Bridge
333 Adams Street, Brooklyn, New York

WITNESS: Person Most Knowledgeable

EXHIBIT B

1 At the date, time and place specified above, the parties represented by Attorney
2 Hartley Hampton of Fibich, Hampton & Leebron, LLP, will take the deposition of the above
3 named witness before a certified shorthand reporter or before any notary public authorized
4 to administer oaths in the State of New York who is present at the specified time and date.
5 In addition, the parties intend to record the deposition by videotape as well as
6 stenographically.
7

8 NOTICE IS FURTHER GIVEN that the matters on which examination is requested
9 are as follows:

- 10 (1) Person most knowledgeable regarding information contained in May 9, 2002,
11 letter from J.R. Brown, director for the office of public information, Watch
12 Tower Bible and Tract Society of Pennsylvania, to Ms. Betsan Powys with
13 the BBC Panorama, attached as Exhibit 1 to this notice;
14
15 (2) Person most knowledgeable regarding the "records" referred to in the 11th
16 paragraph of the May 9, 2002 letter that J.R. Brown wrote to Ms. Betsan
17 Powys (attached as Exhibit 1 to this notice).
18
19 (3) Person most knowledgeable regarding the process by which the "records",
20 referred to in the 11th paragraph of the May 9, 2002 letter that J.R. Brown
21 wrote to Ms. Betsan Powys and attached as Exhibit 1 to this notice, are
22 maintained, updated and accessed.
23
24 (4) Person most knowledgeable regarding the Jehovah's Witness organization's
25 efforts to utilize the "records", referred to in the 11th paragraph of the May 9,
26 2002 letter that J.R. Brown wrote to Ms. Betsan Powys and attached as
27 Exhibit 1 to this notice, to "protect the flock from harm," as that phrase is
28 used in the 11th paragraph of such letter.

1 (5) Person most knowledgeable regarding the position of elder within the
2 Jehovah's Witness organization including, but not limited to, the appointment
3 and removal of elders, the duties, responsibilities and authority of elders, and
4 the relationship between elders and members of their congregation.

5 (6) Person most knowledgeable regarding the position of ministerial servant
6 within the Jehovah's Witness organization including, but not limited to, the
7 appointment and removal of ministerial servants, the duties, responsibilities
8 and authority of ministerial servants, and the relationship between ministerial
9 servants and members of their congregation.
10

11 (7) Person most knowledgeable regarding the role, responsibility and duties of
12 judicial committees within the Jehovah's Witness organization including the
13 process by which judicial committees are comprised and their proceedings
14 are conducted.
15

16 (8) Person most knowledgeable regarding any and all policies that the
17 Jehovah's Witness organization had for handling accusations and proof of
18 child sexual abuse from 1970 to the present.

19 (9) Person most knowledgeable regarding any and all policies that the
20 Jehovah's Witness organization had for warning congregations and their
21 members when a known child molester joined the congregation from 1970
22 to the present.
23

24 NOTICE IS FURTHER GIVEN that the Person Most Knowledgeable shall bring and
25 produce at the deposition the following:

- 26 1. Any and all drafts of the May 9, 2002 letter that J.R. Brown wrote to Ms.
27 Betsan Powys, attached as Exhibit 1 to this notice;
28


2. Any other correspondence between J.R. Brown and Ms. Betsan Powrys other than J.R. Brown's May 9, 2002 letter, which is attached hereto as Exhibit 1;
3. A blank or redacted copy of any form(s) used in connection with the "records" referred to in the May 9, 2002 letter that J.R. Brown wrote to Ms. Betsan Powrys and attached hereto as Exhibit 1;
4. A blank or redacted copy of any form(s) used in connection with allegations or proof of child sexual abuse;
5. A blank or redacted copy of the form used when an elder is appointed;
6. A blank or redacted copy of the form used when an elder is removed;
7. A blank or redacted copy of the form used when a ministerial servant is appointed;
8. A blank or redacted copy of the form used when a ministerial servant is removed;
9. Any and all documents that pertain in any way to any policies that the Jehovah's Witness organization had for handling accusations and proof of child sexual abuse from 1970 to the present; and,
10. Any and all documents that pertain in any way to any policies that the Jehovah's Witness organization had for warning congregations and their members when a known child molester joined the congregation from 1970 to the present.

The deposition will continue day to day, excepting Saturdays, Sundays and holidays, until completed.

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1 Date: September 20, 2005

NOLEN SAUL BRELSFORD


William Brelsford
Attorney for Plaintiffs

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